

**UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO**

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In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO  
RICO,

PROMESA  
Title III

as representative of,

THE COMMONWEALTH OF PUERTO  
RICO, *et al.*

No. 17 BK 3283-LTS  
  
(Jointly Administered)

Debtors.<sup>1</sup>

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**SUPPLEMENTAL DECLARATION OF KIRK BLAIR REGARDING DISCLOSURES  
OF DELOITTE FINANCIAL ADVISORY SERVICES LLP AND  
DELOITTE CONSULTING LLP**

I, Kirk Blair, declare as follows:

1. I am a partner of the firm of Deloitte Financial Advisory Services LLP (“Deloitte FAS”), which has an office at 110 Morris Street, Morristown, New Jersey. I am duly authorized to make and submit this supplemental declaration (the “Declaration”) to supplement the disclosures contained in the declarations I previously submitted to the Court in connection with the respective retentions of Deloitte FAS and Deloitte Consulting LLP (“Deloitte Consulting”)

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<sup>1</sup> The debtors in the jointly-administered Title III cases, along with each debtor’s respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566- LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

(see Docket Nos. 21243 and 22831). Capitalized terms used but not defined herein shall have the meanings ascribed to those terms in such declarations.

2. Accordingly, by this Declaration, I am updating the disclosure made in paragraph 10(i) of the declaration filed on June 28, 2022 by amending and restating it, as follows:

- a. In May of 2019, each of Deloitte FAS and Deloitte & Touche LLP entered into an agreement with the Financial and Oversight Management Board of Puerto Rico (the “FOMB”) and the Official Committee of Unsecured Creditors of the Puerto Rico Title III Debtors (the “UCC”), at their request, which tolled the running of time with respect to any statute of limitation, statute of repose or other time-based limitation or defense regarding potential claims against these Deloitte US Entities. The Deloitte US Entities understand that the potential claims, if any, relate to services performed for the Commonwealth of Puerto Rico prior to the commencement of these Title III cases. These tolling agreements have been extended from time to time by agreement with the FOMB and the UCC and no suit in respect of any claims has been commenced against Deloitte FAS or Deloitte & Touche. Subsequent to the date of the Initial Declaration, the Trustee of the Commonwealth Avoidance Actions Trust (the “Trustee”) requested to set a date for a mediation regarding potential claims, if any, against Deloitte FAS arising from pre-Title III services and the mediation was scheduled for January of 2023. Just prior to the commencement of this mediation, Deloitte FAS and the Trustee agreed to a settlement in principle with respect to certain alleged claims, subject to the execution of a mutually acceptable agreement memorializing the resolution of the matter.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: January 25, 2023

By: Kirk A. Blair  
Kirk Blair  
Partner  
Deloitte Financial Advisory Services LLP

**I HEREBY CERTIFY** that on this same date, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all CM/ECF participants in this case.

Dated: January 25, 2023  
San Juan, Puerto Rico

Respectfully submitted,

/s/Alexandra Casellas-Cabrera  
Alexandra Casellas-Cabrera  
USDC-PR No. 301010  
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*Attorneys for Deloitte Consulting LLP and Deloitte  
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